



THE LAW OFFICES OF
PAUL S. HABERMAN LLC

Address: P.O. Box 167, Norwood, New Jersey 07648

Phone: (201) 564-0590 | **Fax:** (201) 767-2087

Email: psh@paulhabermanlaw.com

Website: www.paulhabermanlaw.com

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Paul S. Haberman, Principal/Owner

* Admitted in New York and New Jersey

March 5, 2018

MEMO ENDORSEMENT: Request DENIED. SO ORDERED.

The Clerk of Court is directed to terminate the motion
pending at ECF No. 114.

Dated: 03/12/2018

A handwritten signature in blue ink, appearing to read 'Stewart D. Aaron'.

VIA ECF

Hon. Stewart D. Aaron

United States Magistrate Judge

Southern District of New York

500 Pearl Street

New York, New York 10007

Re: Solid Oak Sketches, LLC v. Visual Concepts, LLC et al, SDNY Index No.:

1:16-cv-00724-LTS-~~RLE~~ SDA

Your Honor:

I represent plaintiff Solid Oak Sketches, LLC along with Heitner Legal, PLLC in the above-referenced matter. Earlier this afternoon, Your Honor approved an extension of the non-expert discovery deadline to April 20, 2018 on consent per the impending birth of our client's child and we thank you for same. Plaintiff wishes to separately raise with the Court the issue of the 30(b) (6) deposition of Defendant's designated witness. On this point, the Parties could not agree to a request for an additional one (1) month, to May 5, 2018, so that the deposition of a designated defense witness may be completed in a reasonable amount of time after the deposition of Matt Siegler, our client. I thus agreed to submit a separate letter to address the defense deposition at the request of its counsel.

Accordingly, Plaintiff alone respectfully requests an additional one (1) month from the initial non-expert discovery deadline, to May 5, 2018, for the aforementioned defense deposition, as well as any remaining fact discovery issues raised by same. I do not want to see my client prejudiced because

of the need to postpone his deposition for the birth of his child, and am not confident that all non-expert depositions and discovery can be completed by April 20, 2018 given the amount of calendar conflicts the Parties have already encountered while looking for new dates for Mr. Siegler's depositions. In the alternative, it is respectfully requested that the Parties be heard on this issue in a telephone conference with the Court as soon as practicable.

Thank you in advance for your consideration of this letter.

Respectfully Submitted,

/s/

Paul S. Haberman (PH 2771)